

Matthew I. Knepper, Esq.
Nevada Bar No. 12796
Miles N. Clark, Esq.
Nevada Bar No. 13848
KNEPPER & CLARK LLC
5510 So. Fort Apache Rd, Suite 30
Las Vegas, NV 89148
Phone: (702) 856-7430
Fax: (702) 447-8048
Email: matthew.knepper@knepperclark.com
Email: miles.clark@knepperclark.com

David H. Krieger, Esq.
Nevada Bar No. 9086
HAINES & KRIEGER, LLC
8985 S. Eastern Ave., Suite 350
Las Vegas, NV 89123
Phone: (702) 880-5554
Fax: (702) 385-5518
Email: dkrieger@hainesandkrieger.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KATHRYN KNOBEL,

Plaintiff,

vs.

EQUIFAX INFORMATION SERVICES, LLC;
INNOVIS DATA SOLUTIONS, INC.; TRANS
UNION LLC; and WELLS FARGO HOME
MORTGAGE,

Defendants.

Case No.: 2:19-cv-01101-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFF TO
RESPOND TO TRANS UNION LLC'S
MOTION TO DISMISS**

[SECOND REQUEST]

Plaintiff Kathryn Knobel ("Plaintiff"), by and through her counsel of record, and Defendant

Trans Union LLC, ("Trans Union") have agreed and stipulated to the following:

1. On June 25, 2019, Plaintiff filed a Complaint [ECF Dkt. 1].

STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO TRANS UNION LLC'S
MOTION TO DISMISS [SECOND REQUEST] - 1

1 2. On August 21, 2019, Trans Union, filed a Motion to Dismiss the Complaint [ECF
2 Dkt.23].

3 3. On September 4, 2019 the Court granted the Parties' stipulation to extend time for
4 Plaintiff to respond to Trans Union's Motion to Dismiss [ECF Dkt. 26].

5 4. Plaintiff's Response is due September 18, 2019.

6 5. Plaintiff and Trans Union, have agreed to extend Plaintiff's response eight days in
7 order to allow Plaintiff to consider the facts and circumstances of the pending briefing, and to
8 extend Trans Union's deadline to file a reply in support of her motion for seven days for the same
9 reasons. The parties are also engaging in settlement discussions, and resolution without burdening
10 the Court with potentially unnecessary briefing aids in judicial economy. As a result, both Plaintiff
11 and Trans Union, hereby request this Court to further extend the date for Plaintiff to respond to
12 Trans Union's Motion to Dismiss Complaint until **September 26, 2019** and to extend the date for
13 Trans Union, to file their Reply until **October 3, 2019**.

14 //

15 //

16 //

17 //

18 //

19 //

20 //

21 //

22 //

This stipulation is made in good faith, is not interposed for delay, and is not filed for an improper purpose.

IT IS SO STIPULATED.

Dated September 18, 2019.

KNEPPER & CLARK LLC

SNELL & WILMER

/s/ Miles N. Clark

/s/ Kiah D. Beverly-Graham

Matthew I. Knepper, Esq.
Nevada Bar No. 12796
Miles N. Clark, Esq.
Nevada Bar No. 13848
Email: matthew.knepper@knepperclark.com
Email: miles.clark@knepperclark.com

Kelly H. Dove, Esq.
Nevada Bar No. 10569
Kiah D. Beverly-Graham, Esq.
Nevada Bar No. 11916
Email: kdove@swlaw.com
Email: kbeverly@swlaw.com

HAINES & KRIEGER LLC

Counsel for Defendant
Wells Fargo Bank, N.A., sued as Wells Fargo
Home Mortgage

David H. Krieger, Esq.
Nevada Bar No. 9086
Email: dkrieger@hainesandkrieger.com

Counsel for Plaintiff

CLARK HILL PLLC

ALVERSON TAYLOR & SANDERS

/s/ Jeremy J. Thompson

/s/ Trevor Waite

Jeremy J. Thompson, Esq.
Nevada Bar No. 12503
Email: jthompson@clarkhill.com

Kurt R. Bonds, Esq.
Nevada Bar No. 6228
Trevor Waite, Esq.
Nevada Bar No. 13779
Email: kbonds@alversontaylor.com
Email: twaite@alversontaylor.com
Counsel for Defendant
Trans Union LLC

Counsel for Defendant
Equifax Information Services LLC

ORDER GRANTING STIPULATION TO EXTEND TIME FOR PLAINTIFF TO
RESPOND TO TRANS UNION'S MOTION TO DISMISS COMPLAINT

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

Dated: September 19, 2019

STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO TRANS UNION LLC'S MOTION TO DISMISS [SECOND REQUEST] - 3